

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	
<hr/>		Related to Doc. Nos. 157, 1520

**THE DETROIT RETIREMENT SYSTEMS' DISCLOSURE OF
WITNESSES FOR THE DECEMBER 17-19 EVIDENTIARY HEARINGS**

The Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (together, the “Retirement Systems”) hereby disclose their list of witnesses that they may call as witnesses for the evidentiary hearing currently scheduled from December 17, 2013 to December 19, 2013 in connection with the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of That Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief [Dkt. No. 157, the “Assumption Motion”] filed by the City of Detroit (the “City”) and the City’s Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921, and 922 (I) Approving Post-Petition Financing, (II) Granting Liens and Providing

Superpriority Claim Status and (III) Modifying Automatic Stay [Dkt. No. 1520, the “Financing Motion”]. The Retirement Systems may call one or more of the following witnesses:

1. Anne Langan;
2. Irvin Corley;
3. Thomas Gavin;
4. A corporate representative of UBS Bank and/or Bank of America Merrill Lynch (the “Swap Counterparties”) pursuant to Fed. R. Civ. P. 30(b)(6);
5. A corporate representative of Barclays Capital Inc. pursuant to Fed. R. Civ. P. 30(b)(6);
6. A member of the City Council of the City (which individual member possesses the relevant information is unclear at this stage in the discovery proceedings);
7. Any custodian of records necessary to authenticate documents; and
8. Any rebuttal witnesses.

As discovery is still being conducted in this matter, the Retirement Systems reserve the right to amend, supplement, or otherwise modify this Disclosure based upon such discovery.

CLARK HILL PLC

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Dated: December 2, 2013

*Counsel to the Police and Fire Retirement
System of the City of Detroit and the General
Retirement System of the City of Detroit*

EXHIBIT 1

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 2, 2013, The Detroit Retirement Systems' Disclosure of Witnesses for the December 17-19 Evidentiary Hearings was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

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